UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ADVISORY COMMITTEE ON

MEAT AND POULTRY INSPECTION

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SUBCOMMITTEE 1

LINKING FSIS ACTIVITIES TO ITS

PUBLIC HEALTH GOALS

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August 8, 2007 3:00 p.m.

George Mason University 3401 North Fairfax Drive Arlington, Virginia

CHAIRMAN:

MR. MARK SCHAD Schad Meats, Inc.

SUBCOMMITTEE MEMBERS:

MS. KIBBE CONTI

DR. JAMES DICKSON

DR. ANDREA GRONDAHL

DR. CRAIG HENRY

MS. CHERYL JONES

DR. SHELTON MURINDA

MR. STANLEY STROMBERG

MS. CAROL TUCKER FOREMAN

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ALSO PARTICIPATING:

- DR. FAYE BRESLER
- DR. MICHELLE CATLIN
- MR. TONY CORBO
- MS. MISHA JUMBALA
- MR. MARK LOBSTEIN
- DR. CAROL MACZKA
- MR. STANLEY PAINTER
- MR. BRYCE QUICK
- MS. RENEE RETNER
- MR. CURTIS TRAVIS
- DR. DANA VETTER

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I-N-D-E-X

AGENDA ITEM PAGE QUESTIONS: What analyses or approaches would 7 you propose to determine the relationship between FSIS' inspection activities and contamination rates in FSIS-regulated food? What analyses or approaches would 57 you propose to determine the relationship between contamination rates in FSIS-regulated foods and food-related human illnesses?

1	P-R-O-C-E-E-D-I-N-G-S
2	(3:12 p.m.)
3	MR. SCHAD: Can everybody identify
4	themselves so we know everybody's name with a face.
5	My name is Mark Schad, and I'm with Schad
6	Meats.
7	DR. HENRY: And I'm Craig Henry with
8	Grocery Manufacturers/Food Products Association.
9	MS. JONES: Cheryl Jones, Morehouse School
10	of Medicine.
11	MS. TUCKER FOREMAN: Carol TUCKER FOREMAN
12	with Consumer Federation of America.
13	DR. MURINDA: Shelton Murinda, California
14	Pomona.
15	DR. DICKSON: Jim Dickson, Iowa State
16	University.
17	MR. STROMBERG: Stan Stromberg, Oklahoma
18	Department of Agriculture.
19	MS. CONTI: Kibbe Conti, Northern Plains
20	Nutrition Consulting in South Dakota.
21	DR. GRONDAHL: Andrea Grondahl, North
22	Dakota Department of Agriculture.

1	MR. SCHAD: We have some other people from
2	the public here. Will you identify yourselves?
3	DR. VETTER: Dana Vetter, I'm a public
4	health veterinarian, representing NAFV and I also do
5	EIO work 25 percent of the time.
6	MS. JUMBALA: I'm Misha Jumbala (ph.). I'm
7	with the UPN Commission, litigation and I work with
8	food safety.
9	MR. TRAVIS: I'm Curtis Travis, a
10	statistician, consulting with the Data Analysis and
11	Integration Group.
12	DR. MACZKA: I'm Carol Maczka, the
13	Assistant Administrator of OFDER.
14	DR. CATLIN: Michelle Catlin
15	MR. LOBSTEIN: I'm Mark Lobstein with USA
16	Poultry and Egg Export Council.
17	MR. SCHAD: Tony.
18	MR. CORBO: Tony Corbo from the consumer
19	group, Food and Water Watch.
20	MS. RETNER: Renee Retner (ph.). I'm with
21	OIG.
22	DR. BRESLER: Faye Bresler, Technical

Assistant to the National Advisory Committee on 1 2. Microbiological Criteria for Foods. MR. SCHAD: And at the desk? 3 4 MR. PAINTER: I'm Stan Painter, and I'm the 5 Chairman of the National Joint Council on Food 6 Inspectors. 7 MR. SCHAD: And first of all, I'm just going to ask that everybody turn off their cell 8 9 phones just so we have no problems with the 10 transcriber here today. And I first want to say just to alleviate 11 12 any potential concern, everybody here is welcome to 13 speak. I just want to keep the discussion on going 14 and organized and I just want to be sure that the 15 Subcommittee does get their viewpoints and their 16 input in. But like I said, everybody gets their 17 chance to speak. The other thing is, every time you 18 do speak, please identify yourself and that will make 19 the transcriber's job much easier. 20 So is there any questions about the subject

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matter before we get into answering the questions?

Does anybody have some additional input from the full

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subcommittee? 1 2. (No response.) MR. SCHAD: And I was discussing this with 3 4 Dr. Catlin, just a couple of minutes ago. We are 5 looking at all inspector activities in the plant, not just specifically NRs even though that is one of the 6 7 things that the inspectors do. So the first question we need to answer is, 8 9 what analyses or approaches would you propose to determine the relationship between FSIS' inspection 10 11 activities and contamination rates in FSIS-regulated 12 food? For example, correlation analyses, and this is 13 what was talked about at the whole session A to B 14 where we're talking about inspection activities as 15 related to the FSIS-regulated foods. 16 I do have a question for DR. GRONDAHL: 17 Dr. Catlin. Are we also going beyond the scope as 18 far as inspection activities to other than just day-19 to-day activities? For instance, food safety 20 assessments? 21 DR. CATLIN: Yeah, that would be great. 2.2 DR. GRONDAHL: Okay.

1	DR. CATLIN: Whatever you think would be
2	good analyses. We don't want to limit it at all.
3	DR. GRONDAHL: Okay.
4	MR. SCHAD: Then I'm going to ask a
5	question of Dr. Catlin. So if we thought of
6	additional activities, that inspectors might perform,
7	we can use that.
8	DR. CATLIN: That would be great.
9	MR. SCHAD: Yeah.
10	MS. TUCKER FOREMAN: Could I back up one
11	step?
12	MR. SCHAD: Will you identify yourself
13	please, Carol?
14	MS. TUCKER FOREMAN: Sorry. Carol TUCKER
15	FOREMAN, Consumer Federation. When we were speaking
16	in the other room, it occurred to me that if we knew,
17	and this has been said, this is just a way that is
18	easier for me, we knew what contribution to the
19	burden of foodborne illness was created by foods
20	regulated by FSIS, then we would know how to start
21	doing this. We don't have that information. We know
22	as everybody has said, <i>Salmonella</i> comes in lots of

1	different foods, among them poultry and ground beef.
2	So it seems to me that we've got to have some
3	database that shows what part of the burden of
4	foodborne illness is contributed by eating poultry
5	which we call food attribution data.
6	MR. SCHAD: Dr. Catlin.
7	MS. TUCKER FOREMAN: I've gone through, I
8	just needed to get that posed in that way for me to
9	be able to work back to it.
10	DR. CATLIN: That actually is one of the
11	main crux of what the whole topic is about, is how do
12	we get that link between contamination in our food
13	and the public health impact of that contamination.
14	So how do we attribute our foods to public health
15	impact? So that is actually the main question.
16	MS. TUCKER FOREMAN: Our food being FSIS
17	food, regulated food?
18	DR. CATLIN: Yes.
19	MS. TUCKER FOREMAN: Okay.
20	DR. CATLIN: Yeah, and can we get at it
21	through risk assessment or food safety objectives or
22	correlation analyses, things like that.

MR. SCHAD: Well, let's just open it up this way. Does anybody have an idea how we can get to that?

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DR. VETTER: Dana Vetter, NAFV. I think that although imperfect, there are ways to make some If you can build upon some of the existing databases with more information whereas we could see, let's say -- I'll just give an example. There's multiple sanitation and Listeria is just easy, so I'm going to use it, where a plant has decided to use Listeria sanitation to control within its establishment, as its primary means to do so. And that establishment has received multiple SSOP noncompliances, noncompliances for whatever types of failures within that program. And then as a result of that, food safety assessment was initiated which then resulted in an NOIE or suspension, depending on the severity which then could also result in what we call intensified verification Where then we go in and we're finding it sampling. And that can be a link. All those on product. things could be linked together in that sense.

Now as far as linking it on a whole, I'm not sure. I think cumulatively over time that might be something as this goes forward and grows, but at least on an individual establishment basis, I believe that that linkage could be made.

MR. SCHAD: If I could make a request of you, Dr. Vetter, maybe so we're all on the same page here. Since you're a veterinarian, can you just kind of tell everybody kind of a list of what --

DR. VETTER: What we do daily?

MR. SCHAD: Yeah.

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DR. VETTER: Okay. Let me see if I can do this without confusing anyone. Currently, each day there's an automated system for PBIS that selects a task that we are scheduled to do, the IIC or the inspector vet or the inspector under us, and usually that is some type of HACCP task. And it depends on how many different HACCP categories you might have. You might have slaughter. You might have raw not ground, raw ground, and you also might have a ready-to-eat. So you might get a HACCP task for each of those different categories that you would do. And

that could consist of reviewing records where the documented monitoring of their has reviewing corrective actions if they had some sort of CCP deviation. It could be going out and watching them do a monitoring activity or do a verification activity. It could be going out and watching them take samples within their establishment. If they're doing sample for say Listeria, watching somebody take the temperature of a cooked product, watching them basically implement their food safety. So they're not just watching, but going out and verifying that what they said they were going to do, they are doing, and that there aren't food safety issues out there.

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If they find something where they're not following their HACCP plan or instructions for how to monitor CCP and you observe it and you catch it and they don't, that's what we would document on a noncompliance.

For sanitation, when it comes up on our schedule, we will go out and do what's either called a hands on, where we go out and we're looking at, focusing primarily on private contact surface and

secondarily on those that are not product contact surfaces, and do what's called a hands on organoleptic inspection, looking for any residue and sanitary conditions. And if we find it, the plant doesn't catch it, but we do, then we would then document that on a noncompliance. Or we might review SSOP records to see, did they find noncompliances, did they do appropriate corrective actions, are we seeing reoccurrences or trends within those records.

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And we also may go out and watch their QA conduct pre-operational sanitation to again see, are they doing what they said they would do in their written program. So that's basically HACCP and sanitation or SSOP. And then there's other things called SPS and that's Sanitation Performance Standards, and those are really things other than product contact surfaces in terms of sanitation. That might be pest control or it might be pipes, overhead pipes. It might be shipping, the way they're loading and shipping product. It could be the facilities, the condition of the facilities. There's a number of regs that relate specifically to

1 that. then we have what call 2. And we 3 consumer protection. And those are things that 4 relate more to quality issues versus issues of public 5 health concern, and things like bruises and trim are 6 considered quality type issues. 7 That's really a very brief overview. there any specific questions? 8 9 MS. CONTI: Kibbe Conti. Can I just 10 suggest that for the newbies here, that acronyms have 11 been used today. Can you explain to us? Because we 12 have a list, an eight page list. There's several 13 that you just used now that are not on it. For 14 example, CCPD, SSOP, NOIE which my friend explained. 15 DR. VETTER: I'm sorry. We have our own 16 language. 17 (Laughter). 18 DR. VETTER: CCP is critical control point, 19 and that's the end of the HACCP acronym, which is 20 HACCP, Hazard Analysis Critical Control Point. So 21 the CCP are those points in the process that an

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establishment has deemed critical to controlling a

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1	food safety hazard.
2	SSOP stands for Standard Sanitation
3	Operating Procedures, and those are the plant has to
4	have a SSOP in order to operate, that at least
5	describes what they're going to do daily as far as
6	cleaning and those types of procedures and how
7	they're going to monitor that and implement that
8	system, and that's also within their individual
9	SSOPs.
10	And then SPS is Sanitation Performance
11	Standards.
12	DR. HENRY: NOIE, notice of intent to
13	enforce.
14	DR. VETTER: And that's notice of intent to
15	enforce with prior notification.
16	MR. SCHAD: On notice of intent to enforce,
17	Dana, correct me if I'm wrong, I'm not sure there's
18	any set standard on why one is issued but on plants
19	that I've dealt with, they had like a positive for
20	some kind of pathogenic bacteria
21	DR. VETTER: It depends. It's very
22	variable and Bryce may be able to add something to

this, and I think it has changed what rose to the level of an NOIE, five or six years ago, that perspective is different today. We really today are trying to make determinations. Have we gone into an establishment and found issues that would pose a threat to public health, and if that is the case, those things would result in either an NOIE or a suspension.

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Now the difference between a NOIE is that a plant is going to get notification. We have found these things, we expect a response, and typically it's within three business days of how you plan to address them and correct them and if you don't reply to this, then we can suspend your operations or withdraw inspection.

A suspension, an automatic suspension is we found something so egregious that it's an immediate threat to public health and we're going to immediately suspend operations there.

In today's arena, in doing a food safety assessment, the things that resulted in NOIEs, like I said, are things that truly could impact public

1	health and have an impact on public health. And we
2	are really trying to be very rigid about getting
3	immediate responses back before we say this is okay
4	for you to go on and produce product.
5	MR. QUICK: I think more that our
6	regulations are changing. I think that's a very good
7	assessment of what we've done. We're trying to
8	become more uniform and consistent
9	DR. VETTER: Exactly.
10	MR. QUICK: in the way we actually issue
11	NOIEs and do the food safety assessments.
12	DR. VETTER: Correct.
13	MR. QUICK: You heard about quantifying the
14	results of our assessments. That's our goals, to
15	make sure that we quantify end data so that we can
16	extract this data and then make informed decisions.
17	I think Dr. Vetter made a very good assessment.
18	MR. SCHAD: Going back to question 1, maybe
19	I'll ask it in this way. Are there any inspection
20	activities that we can say relate to microbial
21	contamination?
22	MS. TUCKER FOREMAN: Could I once again

1 MR. SCHAD: Go right ahead, Carol. 2. MS. TUCKER FOREMAN: -- try to get a --3 MR. SCHAD: I'm trying to get some 4 feedback. 5 MS. TUCKER FOREMAN: I know and let me give you some feedback. This is Carol TUCKER FOREMAN with 6 7 Consumer Federation. In the best of all possible worlds, 8 best way to know what it is that makes -- how well 9 10 things are working is to have pathogen data on 11 off the end of the line products that come 12 pathogen data on products that are in 13 supermarket. If you could do that, if you could do 14 it for every piece of meat or poultry that comes off 15 the end of the line or goes out of the supermarket, 16 you would have the data then to know this, this is 17 the burden of pathogens in these products. Ιt 18 wouldn't tell you what portion of the foodborne 19 illness it is, but you would at least know what your 20 bottom line is. 21 Then you can control for what you do in the 2.2 plant and decide, well, on these days we did this and

1 the burden went down and on these days we did that 2. and the burden didn't go down. Obviously with raw 3 product that would be influenced somewhat by the 4 quality of the incoming meat. 5 it seems to me that the piece 6 information that you ideally want to have is what is 7 the pathogen load because that's how you tell whether what you're doing really makes any difference. 8 9 DR. HENRY: This is Craig Henry. I think 10 Carol has captured in essence and taken it to a 11 greater degree and that comes back to comments made 12 That's a little bit of again establishing 13 the baseline --14 MS. TUCKER FOREMAN: Yes. 15 DR. HENRY: -- with no direct attribution 16 data or correlation to the illness which ideally 17 net/net at the end of the day, you can get all the 18 numbers, it doesn't make any difference if we haven't 19 reduced the foodborne illness. 20 I think that the essence of And the 21 question, I don't really think we're looking at a

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correlation between FSIS inspection activities and

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contamination rates. I think we're looking or need to be looking ideally at the product type and the processes you used within the facility that affect the contamination with given pathogens of interest. And when you really look at this, I'm not -- I know that the Agency from prior meetings were very much focused on trying to do some predictions, to try to look at what the inspectors and whatever data they have, might give them a crystal ball to try to head off a potential recall. I would certainly submit and advocate that since that was fathomed, we've come a long way, and I have to again default to at least the components that we now look under risk-based inspection are by far, much more quantitative, much specific and much more predictive individual activities. I think the inspectors are trying to do -- they're doing what is prescribed by law, period, end of story. You're either in compliance or you're out of compliance given the regulation. The inherent variability that exists within

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that subpopulation, or within the total population of

inspection activities, either in total or broken down into subparts, is going to be hugely variable.

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Now how much funding, how many resources the Agency wishes to spend to look for a correlation that may or may not be predictive of what today would only be a recall or enforcement action, remains to be seen.

But I think that again we come back now and really look at what Carol has aptly put, the inbound load versus, if you will, the outbound, and when we say outbound, you know, we can't test quality into this. I mean we already know, trying to go through and let's take the toughest example, let's look at Listeria. You're looking at something, a 2 percent infection rate or contamination rate. I mean, you know, I don't think the Agency, I don't think the Federal Government has got enough money to test all of the products coming out on the ready-to-eat basis.

Our bigger challenge, I mean again I think we have to acknowledge something here, the Agency is very focused on ready-to-eat. If there's an intervention in place, that's a process of control,

that is a CCP, and we have a task to try to meet that That's identified and that's through the burden. HACCP, hazard analysis, which is what we need to go forward. I think the bigger challenge though that we're back to is the inbound load on the raw product that is either feeding а further process establishment that has an intervention because, depending on the intervention, you can overwhelm the intervention.

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But in this case, if we set that to the side for the ready-to-eat product and again reflect back on the slaughter of the raw product, we have a bigger challenge. And that challenge is what should we be looking for and to what degree? How many And whether the processes resources do we spend? and/or available interventions exist today to make that change, to make that difference. The Agency and I think all of the experts through elicitation and otherwise, have already acknowledged the fact that there's a given seasonality by any finished raw meat and poultry product. It's a given. So there's going to be a natural up and down. Mother Nature gives us

that whether we like it or not.

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Can we implement an intervention that stabilizes and gets that down to an acceptable level?

I think that's the challenge that lies before us.

MS. TUCKER FOREMAN: Craig, just to take you back one step.

DR. HENRY: Sure.

MS. TUCKER FOREMAN: I think what we need first is, in a short phrase, baseline data. We need to know what's the load coming in and what's the load going out. If you know those two things, then you begin to know what interventions have worked but I'm trying to get back to your 2003 NAS report where you talked at great length about some of the problems with getting this information but we don't have baseline data right now that we can really start We don't have current data on trim. have current baseline data on ground beef. We don't have current baseline data on most ready to eat products, do we? I don't think so.

DR. HENRY: Well, again we have to come back and reflect now. Again we take a premise that

1	the products being produced are intended to be as
2	high quality as possible within the scope and purview
3	of the process. All of the data does exist for
4	quality control purposes within the facility. Does
5	FSIS have that within their database? No, not beyond
6	what they would automatically accumulate through PBIS
7	and verification testing.
8	Now, of course, that comes back to say is
9	there more needed than what we currently have to
10	exemplify the inbound load?
11	MS. TUCKER FOREMAN: Well, the verification
12	data, you know, again it just doesn't give you any
13	information about national prevalence.
14	DR. HENRY: National prevalence. Excuse
15	me. National prevalence or product prevalence.
16	MS. TUCKER FOREMAN: Product prevalence for
17	a particular product. National prevalence for a
18	particular product.
19	DR. HENRY: Why not?
20	MS. TUCKER FOREMAN: Because it only
21	reflects what's happened in one plant on one day.
22	DR. HENRY: But you've got that for every

day.

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MS. TUCKER FOREMAN: FSIS doesn't have it for every day. The baseline studies are what provides exactly what it says. The baseline information about what's the pathogen load on beef and when it gets to the end of the line in the slaughterhouse, I believe that's where the data was collected. Is that where they're collected?

MR. QUICK: Yeah, I know that we have a trim baseline underway and a ground turkey and ground beef I believe but we don't have the baseline that you're talking about at retail.

MS. TUCKER FOREMAN: Well, yeah, of course not. And some of the baselines are real old. The Salmonella, broiler Salmonella baseline goes back to the beginning of HACCP. It's 11 years old. So it seems to me that if you talk about what information you need, what information we need, current baseline data. So much has happened in the last 10 years that has improved the quality, and when I say quality, I'm talking microbe, microbiological quality of these, of these products that we've got to have some correct —

1	unless you all behind me will tell me that you
2	already have that information. I don't know how you
3	begin to build what makes a difference until you know
4	what's there.
5	MR. SCHAD: Dana.
6	DR. VETTER: I was just going to say, Dana
7	Vetter, NAFV, that I also believe we just underwent a
8	baseline for turkey carcass , and I think they did
9	also another baseline study for chicken carcass
10	rinses as well recently. Now I don't know if that's
11	all been analyzed and put out at this point, but that
12	was very recently within the last year that we have
13	done that.
14	MS. TUCKER FOREMAN: I didn't know that it
15	was actually completed, and
16	DR. VETTER: It hasn't been analyzed yet,
17	but
18	MR. SCHAD: Excuse me. You all cannot talk
19	at the same time if we're going to have a clear
20	record.
21	MS. TUCKER FOREMAN: Okay.
22	DR. DICKSON: I'm not disagreeing with

anything that's been said up to this point. I think there are some good ideas.

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Looking at this question based on what's currently available, and that's kind of the approach I've taken to it, what we do have is Salmonella compliance data, regulatory data that has collected by FSIS and if the analysis of NRs or whatever you choose to look at were confined to a specific plant during the time those Salmonella samples were collected, that would reduce a lot of the background -- that will simply say this is the we've collected timeframe that the Salmonella samples, this is the timeframe we're looking at, NRs or failures in HACCP plans or sanitation failures, but by confining it to that specific time period, then you're not saying, well, we took a set of samples here in January and we're going to look at the entire year for that particular establishment. It might make the analysis a little easier maybe, I don't know.

MS. TUCKER FOREMAN: Let me ask Carol. You would then like to limit the NRs to the same

timeframe, but then you just have the information for 1 2. that plant. But if you do the 3 DR. DICKSON: Right. 4 analysis for each establishment during the time 5 period that those Salmonella samples are 6 collected, that may give you some insight. 7 MS. TUCKER FOREMAN: Going forward? 8 Starting now, going forward, because this may be an 9 easier thing than baselines. 10 MR. DICKSON: Right. 11 MS. TUCKER FOREMAN: If we wanted to take 12 the compliance data and I'm not qualified to say 13 this. I'm probing here. If you have the Salmonella 14 compliance data, for a plant and the NRs and you had 15 it for, you know, they only do this rarely, but if 16 you actually had compliance data over a period of "X" 17 number of days of the year so that you hit the 18 seasons, is that what you have? 19 Then I think if you just --MR. DICKSON:

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if you could look at NRs, and this may be in the

database already, if you could look at NRs during the

same time period that the Salmonella samples were

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Annapolis, MD 21409 (410) 974-0947 collected, I just think from a data analysis standpoint, that's going to make the analysis a little simpler.

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DR. CATLIN: This is Michelle Catlin. What we actually did was we looked at the NRs -- we matched everything up for the HACCP or whatever activity was done and we matched that up to the date the sample was taken. So we were pairing up the data, each establishment's data by the date of the verification -- and the date of the sample being pulled. So we were trying to pair everything up on a daily basis, for every establishment and then looking at -- how they all looked.

DR. DICKSON: And if I can ask, are you seeing any trends at all so far? You probably aren't far enough into it.

DR. CATLIN: We aren't far along. It looks like we might be able to, but we aren't far along to tease out the data. As many of you know probably know, some of the data is very complicated. So we have to make sure that we're actually looking at the right data in the right way and interpreting it

1	correctly. What we were doing was just trying to
2	DR. DICKSON: And this may not be
3	specifically related to question number 1. Are you
4	currently serotyping all of the Salmonella that you
5	recover?
6	DR. VETTER: Yes, we are.
7	DR. DICKSON: I don't need the answer
8	today. I'm just asking for informational purposes.
9	MR. SCHAD: That's a yes?
10	DR. VETTER: Yes.
11	MR. SCHAD: We can't get a nod of the head
12	on the tape.
13	(Laughter.)
14	DR. VETTER: Dana Vetter, NAFV. I'll just
15	comment to that. The answer is yes. And we have
16	been at least over the last year and maybe sometime
17	before that, Bryce is looking confused over there,
18	but I can tell you from the results that we've
19	received that in Learn, at least for Salmonella sets,
20	and that's both whole carcass and ground, what we
21	currently are getting is it'll first come up positive
22	and usually we'll have a subgroup like it might be B,

C, L, D, and then later on we'll go back and we'll see that that result has been amended. And for those of you who don't know, Learn is our database for laboratory results, FSIS' database for laboratory results. And we'll see that it's been amended and then that's where we'll have the serotype there. the plants have the capability of getting those results as well, e-mailed to -- the registered report, but typically we provide that to them as they come in to us. But at least from what I'm seeing and what we're actually doing, and at my duty station, we're currently undergoing a ground Salmonella set that we are serotyping all of the -- at least for Salmonella. DR. DICKSON: If I may add one more comment Again, Jim Dickson. What are you doing with here. that data? What kind of analyses are being currently done with that data? DR. CATLIN: The Data Analysis Group has

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they are doing.

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not want to speak OPHS -- because I'm not sure what

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not started doing anything with that data yet.

MR. SCHAD: Jim, do you have some suggestions or --

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DR. DICKSON: Well, I'm again trying to use the information that's available, and that's why I was asking what information was available. You might put serovar into the analysis mix just to see what comes out either by species or by geographic region or by season or something like that. I'm just trying to see -- to me that first question is what can we do with the information we have.

MR. SCHAD: You've got to help me out, please help me out with what you just said.

DR. DICKSON: Okay. Well, again there's many different types of Salmonella and as I said, my read of the first question, and if I'm wrong, I'll be the first to admit it, is what can we do with the data that we have, and it seems as if, if we have information on serovar, then that may provide some insight as I said either by animal species or by geographic region or season of the year. There maybe something that can be teased out of that in data analysis, and then I'm just strictly looking at data

1	that's currently available rather than saying let's
2	go out and change everything and do things different.
3	That's question 2.
4	But question 1 is what can we do with the
5	data that we have. I'm just trying to be sure that
6	we're getting the most out of the data that's
7	available before we move into what would we do
8	differently.
9	MR. SCHAD: So you're talking about types
10	of Salmonella by serotyping.
11	DR. DICKSON: Yes, sir. Which is something
12	which is currently being done. So that may be a data
13	resource that may not be fully tapped at this point
14	in time.
15	MR. SCHAD: And you're talking about
16	comparing it with seasons of the year and what were
17	some of the other things?
18	DR. DICKSON: Geographic region,
19	seasonality production, animal species. It just
20	it may be a data source that is not fully being
21	exploited at this particular point in time.
22	(Laughter.)

1	DR. MURINDA: My contribution was
2	correlated to either actually. He's talking with
3	Shelton Murinda. He's talking with relevance to the
4	different types of serovars for example with
5	Salmonella. It is also important to use other
6	methods that associate the different types of
7	Salmonellas that have been isolated in the various
8	environments using some of the methods they talked
9	about. You talk about PFGE. Is that the only
10	method you use?
11	DR. CATLIN: The serotyping is not the
12	PFGE. That's more subtyping.
13	DR. MURINDA: What I'm trying to link, the
14	serovars to I'm trying to link PFGE to subtyping.
15	DR. CATLIN: ARS is subtyping for PFGE, and
16	they're also doing some antimicrobial resistance,
17	microbial resistance information on it as well.
18	MR. SCHAD: Stan.
19	MR. STROMBERG: I would just like to make a
20	point. I think that trying to tie NRs to possible
21	pathogen presence would be awful difficult unless you
22	really get in and look at the specifics of the NR,

and I don't know whether you're looking at the NRs just because they had a HACCP NR or whether they had an SSOP NR but the fact that they had a HACCP NR or a SSOP NR can cover so many different things that it might or might not have anything to do with direct product contamination. It may be a recordkeeping situation. So if you're going to look at them, I would just encourage you to -- you're going to have to do more than just say we had a SSOP NR and we had a positive Salmonella sample that day, does necessarily correlate other than the two happened the same day unless you really get into the specifics of what the NR was about and what the problem was on the NR, and I don't know how you guys look at that but --Well, DR. CATLIN: what we've initially is look at what the activity is, and the likelihood of that activity being related to Salmonella for example, and we kind of look just at, those products that anticipate on we having Salmonella in the first place, so that we're not sort of fluttering down with non-relevant information. we did try to, a priority, choose those activities

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1 for which a NR would be possibly related to 2. contamination. We didn't go in and look at 3 detailed, handwritten information on every NR to see 4 exactly what was going on. We tried to choose those 5 that we thought would have kind of some 6 relationship. 7 MR. STROMBERG: If you don't do that, 8

you're probably not getting a true picture of what's going on, and I think Dr. Vetter can attest to that, you know, just because you've got that NR, there's an awful lot of things that can fall under a HACCP NR or a SSOP NR that could not be at all related to anything that had to do with the presence of pathogens. So --

MR. SCHAD: Stan Painter.

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MR. PAINTER: Yeah, Stan Painter with National Joint Council. I just want to say that taking all, doing all your studies and all your little databases and all of your little baseline studies are worthless unless you have someone in the field that is trained to do the tasks.

Let me give you an example of what I'm

talking about. Let me get on my soapbox here. In 1996, I was a GS-7. The G-8 was out, and my supervisor handed me this package and said, here, I've got to staff the plant, read this, and you and I have to take a Salmonella sample. Okay. Well, that was all the training she got. That was all the training that I received. The Agency has gotten a little better since that point in time in training its employees and taking the samples.

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You know, the samples will get to the lab part of the time, and for whatever reason, there's something that happened that the sample has to be discarded. Well, the whole thing the Agency then will do is, we'll discipline the employee that's never been trained. You're going to have to train your workforce. You're going to have to staff the plants. The Agency is not only required, given the right by law under the statute, under 7106, to hire, fire, directly, layoff, you have a responsibility as well as an Agency to hire, and you can't expect, as Felicia said earlier, the machine to do what it's supposed to if the machine's not there.

1	When you go into a plant and the Agency
2	
4	said, and this is a direct quote, "go in the front
3	door, wave at them as you go through, and go out the
4	back door." That's worthless. That is worthless and
5	you don't have time to do what you're supposed to do
6	as far as SSOPs. You don't have time to go by NRs
7	because you don't have time to write a NR.
8	So you're going to have to as an Agency,
9	you're going to have to hire people. You're going to
10	have to train those people in order to put into
11	effect your baseline studies. All that's worthless.
12	That is worthless until you do what you need to do in
13	the field to implement but you don't. Thank you.
14	MS. TUCKER FOREMAN: Carol. Bryce and
15	Tony, everybody's now had at least one Salmonella set
16	done. Have all the plants had two?
17	MR. QUICK: July 1st they were supposed to
18	be done with their second.
19	MR. SCHAD: Are we talking about the
20	Salmonella verification.
21	MS. TUCKER FOREMAN: Yes.
22	MR. QUICK: We're supposed to get through

1	two in July.
2	MS. TUCKER FOREMAN: Through two
3	MR. QUICK: We should be there now.
4	MS. TUCKER FOREMAN: in July. Should be
5	there. So we have some pretty new
6	MR. QUICK: We've got some good data.
7	MS. TUCKER FOREMAN: Salmonella
8	verification data. So you might it might not be a
9	real big job to take a look at what the NRs were
10	during the period that that last set was being taken.
11	Has it taken a year to do that second set?
12	MR. QUICK: It's taken us maybe a little
13	longer than that.
14	MS. TUCKER FOREMAN: But that's for
15	everybody. There's three periods for each plant that
16	you could do what Jim's suggesting.
17	MR. QUICK: Yes.
18	MS. TUCKER FOREMAN: One of my concerns is,
19	and part of what Stan says in part, because we've had
20	some trouble with the Salmonella set methodology, I
21	think that it's worthwhile looking to see if the data
22	you have on hand's worth will get you what you

need or get you some semblance of what you need but 1 2. I'd hate to see a whole lot of time go by assuming that it's what we need when you also have baseline 3 4 data going and they were devised really to do this 5 It's just that it's real old, some of it 10 6 years old. But now you're telling me that we've got 7 enough new data to be meaningful? MR. QUICK: We think so. We think that --8 9 MS. TUCKER FOREMAN: How long from being 10 published? 11 MR. QUICK: I don't have the exact answer, 12 but I anticipate very shortly because we promised 13 that we would consider -- with the Salmonella 14 incentive program, that we would post the names of 15 the plants and their percentages but at the same time 16 that we would look at the performance and make 17 decisions based on that. So --18 MS. TUCKER FOREMAN: But I'm not looking --19 here we're not talking about individual plants. 20 we're looking for is nameless entities, so that you 21 know what is out there, as much as possible what's 2.2 out there across the country.

1	MR. QUICK: Well, I do think we plan on
2	aggregating it and giving you the overall trend that
3	we're seeing, based on whatever data we collected.
4	MS. TUCKER FOREMAN: And you would do that
5	by plant size, too, and seasonality and
6	MR. QUICK: I don't know about seasonality.
7	I know by plant size. Carol.
8	DR. MACZKA: We can do that.
9	MR. QUICK: Is it by seasonality as well?
10	DR. MACZKA: And you're saying we can
11	comb through this data pretty quickly and then do a
12	sort by plant size, by seasonality.
13	MS. TUCKER FOREMAN: What's the point at
14	which the based on? Is that carcass?
15	DR. MACZKA: The beef trim?
16	MS. TUCKER FOREMAN: Beef trim, is there a
17	carcass
18	DR. MACZKA: I'm
19	DR. HENRY: There's carcass swabs.
20	DR. MURINDA: What's the question?
21	DR. HENRY: Carcass swab data and then
22	there's trim and then there's ground beef data, trim

1 being the newest. 2. Craig, did you have something? MR. TYNAN: Yeah, I think we're down a 3 DR. **HENRY:** 4 particular hole right now chasing a rabbit, and I'm 5 just going to come back in the interest of time because we don't have all week to do this. 6 It's 7 4:00. Reading this document, it is very wide 8 9 ranged, its scope, and has no real breakout as I 10 stated before. It's talking about everything from 11 soup to nuts. It's talking about RTE. It's talking 12 about raw. And I think you've got to, you know, get 13 down to what are we going to answer, and let's get 14 back to question 1. 15 Question 1 just simply asks us, you know, 16 what analyses or approaches could be used to evaluate 17 FSIS activities relative to contamination rates and 18 regulated foods? 19 Well, that's pretty simple. You already 20 know what FSIS inspection activities are. PBIS.

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have whatever you have in the way of raw data and we

don't need to get into critiquing data that you do

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have but you do have data, be it current as of this year, it's no different than the one we've had for the last 6, 8, 10 years. I mean it's the same process. It's sets. How many plants we're getting better at, blah, blah, blah.

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Hopefully, they're collected in a manner that are usable. If Mr. Painter is accurate in his statement, then the date is not usable, is not relevant because the training is not there and the sampling is now in error. That would have to be sorted out internally. We can't answer that question.

However, relative to part 2, what are the contamination rates in the finished food products now? What are those products? If we're dealing with the raw, whole carcass, that's one thing. Tell me which product you're talking about. I don't know from this. But that's kind of a jump all.

So if FSIS is saying they don't have enough data in the finished products, that's one thing. But how for you, you know, for us to tell you how to go about doing correlation between the activities you

already have and the data you already have, unless you're asking us to say specifically which activities are most appropriate, that's too broad unless you get down by plant, by process, by product. I can't answer that question. It's just too broad in itself.

And Salmonella sets are in the statutes as they exist today.

So, you know, it's just too broad. I don't know how to get my hands around that animal. Stan.

MR. SCHAD: Yes, Stan.

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This is Stan Painter with the MR. PAINTER: Joint Council. This is National exactly what happened in the last Subcommittee, exactly what was just stated. And my recommendation to the group was we didn't have enough information. You give the group a subject and you say talk about it, but you don't give all of the information, and then you want a recommendation, and I would say, I would be very cautious because if you give kind of any recommendation, without all the pieces to the puzzle, it could come back to bite you.

MR. SCHAD: Michelle.

DR. CATLIN: Actually what we're looking 1 2 for is actually what Dr. Henry alluded to was what types of activities that our inspectors are doing 3 4 that we can possibly use to try to draw some of this 5 correlation. for the microbial contamination and 6 As 7 which products, it's going to vary product by 8 product, my thought on it, it will vary product by 9 product because there's only certain products that we 10 have certain microbial data associated with. So it is sort of that question of what, you 11 12 know, many of you are familiar with the types of 13 information that we have and the data that 14 collect, and of those data, are there data that would 15 be useful for drawing this correlation, more useful 16 or less useful and if you know any specifics about, 17 you know, which microbial contamination you would 18 think --19 DR. HENRY: Go ahead. 20 I was just going to say I hope MR. SCHAD: 21 that we didn't just waste a bunch of time here. 2.2 That's why when I started out and the group wasn't

saying very much, that's why -- said, are there any activities that are performed now -- and I was going to try to, you know, because I'm getting all this feedback. There's so many that doesn't work, the data doesn't work.

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Andrea Grondahl. DR. GRONDAHL: I would like to say this as a little bit to what Stan touched on earlier, and I think it's very important that you not narrow the field to just looking at NRs. I think you need to look at all inspection activities, all and every inspection activities. And when you are looking at things like NRs, you know, not only keep in mind that there's so many different PBIS, if looking at sanitation, you're there's so different NRs that can be written on one particular code, and you need to look at the particulars of it, and you need to go beyond that because there's so much variability amongst the inspection staff. this is whether it's a state inspector, federal inspector. You're going to have inspectors that are very, very motivated, and they might write 10 sanitation NRs in 2 months, and you could have a

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different inspector at that same plant write 1 NR.
You know, there's a lot of variability, and so you
need to be careful with that especially if you're
quantifying it, and just looking at, okay, this -how many NRs were written, you know, looking at
things like food safety assessments.

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Maybe even considering the possibility of looking at in plant performance system. You know, employee evaluations. Okay. Well, there weren't many NRs written but was that because of compliance problem with the plant or was it because of an inspector maybe not being very motivated in writing NRs.

MR. CORBO: Or not having an inspector.
Tony Corbo.

MS. TUCKER FOREMAN: This is Carol. Those are absolutely all serious issues. Meat inspection doesn't have very many objective measurements. The only objective measurements they are known to have are pathogen loads. If you define where those are, then at least you've got, you know, if you define places where you should know what the pathogen load

is, you at least have that piece of information. And Stan says that may not be particularly good, but give me a number of the microbial testing. That's the only place you can get a number. Everything else has the -- of a human being heavily on.

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DR. VETTER: Just a couple -- I know that it you know, linking a correlation analysis says, between subsets of NRs and that's one example of where FSIS inspection activities and microbial contamination, and again, I think that's difficult to point out without having attribution data, but I do think that there might be another way of looking at it because you can directly, I believe, look at FSIS inspection activities and rates of noncompliance and possibly predict risk to public health. not exactly microbial contamination but risk public health based on rates of noncompliances with critical points in a system.

Do we have the capability to drill down now to specific NRs given this example repeated but in SSOP noncompliance that that correlates directly to a Listeria control program? Not unless you've got

people sitting there and reading the body of the NR.

Maybe in the future, adding some capability to be able to identify that this NR relates specifically to a pathogen or it does not relate to a pathogen or a pathogen control system, might be beneficial in the future.

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As far as what we have existing now and also what goes, and I've mentioned this as well, but a standard operating procedure for entering the data would definitely make it more useful, reliable and predictive I guess when you're looking correlations because it is absolutely true. know because there are inconsistencies between shifts on how we enter the data. There are inconsistencies between the plants. And some -- we have PHB teams now and some of us are working through that to try and become more consistent but, you know, in working that, differences through there's even and disagreements on how.

So if some of our superiors in management could maybe come up with a way that they would like to see the data entered in a consistent manner, that

might be helpful in the here and now and in the future for the databases that we have.

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MR. QUICK: If I could just -- Bryce Quick. I think starting about two years ago, we had a NR situation with SR -- and we, as a management team, came up with a dropdown menu. That was I think one of the first attempts to get a uniform and consistent data gathering to where an inspector in Pennsylvania was recording the same type of activity that was It's not perfect, but that's happening in Texas. pretty much -- that's what we're using as the model for the redesign of PBIS in the future. that's Carol and Dan and their groups are -- that's really their challenge, is to get this uniform and the consistent across country, so that happening in one part is happening in another, and we can actually say with confidence that we know what's It's an age-old problem, happening. but it's something that I think is central as Dana mentioned to this whole data effort.

DR. HENRY: Craig Henry. I'd like to move forward with this and make some recommendations so we

can get things going here a little bit.

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I would recommend that FSIS at this particular time attempt to correlate HACCP oriented NRs being first choice, SSOPs being second choice, to whatever microbial data they currently have on record regardless of product line or product type. And I don't have the exact detail but I know that FSIS has already drilled down on NR categorization relative to food safety risk, basis the risk-based inspection components.

So I think it's there, you know, we hashed this before but I would say if you want to know which activities to go do, start with those that we know are a direct failure, especially, go to the next level, CCP failure, corrective action failure. I mean go through the HACCP principles. If they failed in that area, we probably got a big risk on our hands, and there's probably some part of the process, maybe some part of the process that has allowed a greater contamination rate.

Carol's point, I'm kind of holding off here. So I think I'd like to get to part 2, because

I think part 1 we've thrashed this one well beyond 1 2. necessity, but if you're going to go do it, just go 3 do it. You know, you've got the data. You've got 4 the activities. Whatever you're going to do with the 5 NRs, what Dana said is absolutely correct. 6 Stan Painter knows. That every NR is going to 7 have to be evaluated for its inherent value. some of the NRs today that correlated 417, no matter 8 9 how you look at it, you know, aren't really a major 10 food safety risk, but are related back to HACCP. 11 So there's things that you're going to have 12 You've got that information. Run with it. 13 don't think we can tell you much more along that 14 line. So I'd like to make that recommendation and 15 see if we can --16 MR. SCHAD: How does the Subcommittee feel 17 about his recommendations? 18 MS. TUCKER FOREMAN: I'm not sure I'm ready 19 to get onto it because I'm not confident that we're 20 not just chasing more time after something that so 21 far has not gotten us much. So let me hold. I don't 2.2 have an alternative right now.

1	MR. SCHAD: Okay. I think in the interest
2	of time, we need to move onto question 2.
3	MS. TUCKER FOREMAN: That's fine.
4	MR. SCHAD: Okay.
5	DR. DICKSON: I have one final comment on
6	question 1, is that with the correlation analysis
7	and, Carol, this may be what you're talking about,
8	you know, tell us two things. It first off tells how
9	much variability can be explained by NRs. It also
10	tells how much variability that cannot be explained
11	by some of these things. So we have to keep the
12	analysis in perspective. It's really telling us two
13	things there.
14	MS. TUCKER FOREMAN: You know, I have to
15	tell you that I've sat around and read hundreds of
16	pages of NRs over the years, and I would hate to ever
17	have to try to make a graph, a chart of what I read
18	because they are to me as individual as the plant and
19	the inspector
20	UNIDENTIFIED SPEAKER: Absolutely.
21	MS. TUCKER FOREMAN: and coming up with
22	anything meaningful from vast numbers of NRs, as I

1	said, just my personal experience of reading them, I
2	came away thinking, oh, my God. At least it is
3	let me clarify. It is my understanding that the
4	Agency has gone through and broken out what it now
5	defines as public health NRs.
6	UNIDENTIFIED SPEAKER: Yes.
7	MS. TUCKER FOREMAN: So, you know, that
8	would be my first problem with it taking that away.
9	Do you feel like
10	DR. MACZKA: Yeah. We have gone a step
11	further with some of the Salmonella data. We did
12	look at a subset of the NRs that we feel are
13	Salmonella related, and then we compared those
14	subsets of NRs to the Salmonella data and although
15	Michelle doesn't want to put this on record yet,
16	because they haven't
17	DR. CATLIN: Verified all the data and
18	everything.
19	DR. MACZKA: We are seeing a correlation.
20	MS. TUCKER FOREMAN: Tell me what, tell me
21	what a NR is that links to a Salmonella
22	contamination.

1	DR. CATLIN: I honestly can't remember off
2	the top of my head which ones it was because we had
3	someone else who was much more knowledgeable about
4	this stuff than I am, to go through the public health
5	ones and the ones she felt were public health
6	related. Some of them I know she was eliminating
7	were things that were specifically related to
8	Listeria. Some of the things were specifically
9	related to <i>Listeria</i> , so I she would eliminate that
10	because you wouldn't expect any correlation to
11	Salmonella on that. So that's one example of what
12	she was looking for.
13	MS. TUCKER FOREMAN: But you can't tell
14	me
15	MR. SCHAD: Excuse me, Carol. I think
16	we're going to have to move on here.
17	MS. TUCKER FOREMAN: Well, let me just
18	I'm just curious about what, what would get written
19	up in a NR that we would feel confident was related
20	to Salmonella contamination.
21	DR. CATLIN: Like I said, I can't remember
22	off the top of my head.

1	DR. MACZKA: We'd be happy to get you a
2	list.
3	MS. TUCKER FOREMAN: Okay. But we have to
4	do it so we can have some reference to it before we
5	make our recommendations. It's late in the afternoon
6	and not able to come up with an idea.
7	DR. CATLIN: We'll get
8	MR. SCHAD: Well, think we need to move
9	onto question 2, or we'll never get done here.
10	DR. GRONDAHL: Mark.
11	MR. SCHAD: Yes.
12	DR. GRONDAHL: Andrea Grondahl here. I
13	just I agree with Craig's answer. I think that's
14	good but unless everyone else disagrees, I'd like to
15	add food safety assessments to that answer as one
16	inspection activity.
17	DR. VETTER: Dana Vetter, NAFV. I would
18	just add that especially once you get the
19	quantitative FSA data working, to correlate the two
20	are what the findings in the FSA, are they reflective
21	of those NRs in the plant or is there extraordinary
22	difference between the two. And they can both help
	arrierence between the two. This they can been herp

validate and verify one another, both sets of data to So not only that you take that data and do that. look at it and analyze it but also use it to compare and see if it's consistent or not. MR. SCHAD: Is anybody ready for question We're only one third of the way done. DR. **HENRY:** Okay. I'll start off on question 2. I think question 2 is where we have a real opportunity to bridge back and get to the real issue which is the food-related human illness. It says what analyses or approaches would you propose to determine the relationship between contamination rates in regulated products to food health illness, expert elicitation, risk assessment, et cetera? This is where I'll go back now to where Carol first started, and I think, and again, we're going to have to -- this question again is too broad, but we're going to focus I think on the raw side. think the RTE side is a relatively given. But on the raw side, I would submit that a process, this process here is a little backwards as

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is laid out. A to B to C. C should be A. We need to start from the issue not all of the wonderful information that nature provides us from the plant, from the farm. We need to start with what are the target pathogens, and we're not talking about pluses and minuses, which is essentially all that the Agency has right now. They have a plus and a minus and maybe they've got a serotype, maybe we don't. Maybe we've got PFGE, maybe we don't.

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We need to get to the crux of the matter and identify to the best of our ability the attribution data and the epidemiological data that characterizes the foodborne illness tied to an FSIS-regulated product. That now needs to be reflected back through the process in a couple of ways.

One, if we're going to do anything to enhance the microbial characterization of either the inbound raw product or the outbound finished FSIS inspected product, we need to look at enumeration. We need to look at consistent serotyping. And then we also need to address appropriate interventions. Without that, all we can do is say, ho hum, that's

interesting. Look what Mother Nature gives us because we're not changing anything and this needs to be done in a discrete period of time.

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Again, I concur with other comments made here, information by plant, by product, by inspector, is very specific and we have to look because that is the process. It's not the U.S. process. It's not the district process. It's not the region process. It is the process that's being used by a given plant to produce a finished product, whatever that may be. That is the only thing that stands totally by itself, and needs to be evaluated.

Now to do any of this, I would certainly propose that the appropriate funding needs to be levied and applied, one for CDC, at the state level more attribution data rapidly acquired, to get properly characterized and through the system of which CDC has a huge bottleneck, a huge database that evaluated, has not been that has not been relinquished and put out, and it takes years for that That's not going to help us with happen. evaluating real time, real world processing and/or

1	product production schemes.
2	Tied to that, let's get to the serotyping.
3	And I'll just ask the question quickly. Who does all
4	your serotyping?
5	DR. MACZKA: The serotyping is done by
6	FSIS.
7	DR. HENRY: No, the specific lab. Ames to
8	my understanding. Most all of it goes to Ames.
9	DR. BRESLER: The PFGE for raw is done by
10	ARS. The PFGE for ready-to-eat is done with FSIS in
11	the Eastern Lab.
12	MR. SCHAD: Okay. That's
13	DR. BRESLER: This is Faye Bresler.
14	DR. HENRY: Craig Henry again. So the
15	point in question or the point to take, the funding
16	needs to include samples submitted, if we're going to
17	chase, you know, and try to address the problem with
18	specific pathogens, the funding needs to be broad
19	enough that plants who are going to supply data and
20	help get this process better characterized, that's
21	serotyping of those samples needs to be done through

the federal establishments so we don't worry about

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accredited facilities, we get consistent results.

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And the reason I put that forth is because this is not just what would be schemed a huge plant, one of the large plants. We've got to deal with the small plants. If we look at a lot of the recalls, a lot of the challenges that exist today, certainly can occur within the small as well as the large, but the small plants and the very small plants do not have the financial wherewithal to capture and characterize their own serotyping data or their PFGE data.

The other issue that comes back, the PFGE data right now that we have is so narrow in scope that it's very difficult to really reflect back and say whether it's a really unique serotype or not, PFGE pattern. Case of point, look at the *Lm* issue from four years ago. And we're not too far off the same mark with the cordon bleu from Minnesota that happened just a year and a half ago.

But I think -- what I'm saying is we need to have a focused approach that then takes us all the way back so we can look at enumeration of the inbound

load, appropriate serotyping of the inbound load and then as would be appropriate, whether there's enough funding to look at finished product remains to be seen because that's a huge challenge, based on the incidence or whatever pathogen we're looking at. We need to get the attribution data beefed up with the foodborne illness.

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Now taking that, if we're able to put that in place which requires appropriate funding, the last part of the puzzle, we haven't really changed anything, we're just looking for correlation, we need to take a very close look at what interventions do we have on the livestock. It was brought up yesterday by Dr. Goldman, much too most chagrin of people in there, we have regulatory obstacles and barriers right now for interventions that have been available for almost 15 years, and case in point, probiotics and by the way, it was developed by ARS.

Now we also have had similar interventions such as inactivated vaccines that have met regulatory barriers, which just recently have only been somewhat relaxed. What is the point of that? Today if we

1	want to reduce the load or challenge to a finished
2	product going into the commercial channel, we need to
3	have better interventions. Those type of regulatory
4	barriers which have now prevailed for years and
5	decades, provide a disincentive for allied industry,
б	namely vaccine companies or other, to come up with
7	new interventions and to invest in that, and that's
8	their expertise.
9	So enough said. That's what I think we
10	need to get our hands around relative to question
11	number 2.
12	MR. SCHAD: Thank you, Craig.
12 13	MR. SCHAD: Thank you, Craig. DR. BRESLER: Faye Bresler. Just a
13	DR. BRESLER: Faye Bresler. Just a
13 14	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that
13 14 15	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that is for Salmonella.
13 14 15 16	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that is for Salmonella. DR. HENRY: Of course. This is Craig
13 14 15 16 17	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that is for Salmonella. DR. HENRY: Of course. This is Craig Henry. But we have to bear in mind that we're not
13 14 15 16 17	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that is for Salmonella. DR. HENRY: Of course. This is Craig Henry. But we have to bear in mind that we're not dealing with only Salmonella here as we step through.
13 14 15 16 17 18	DR. BRESLER: Faye Bresler. Just a clarification, for serotype and PFGE information that is for Salmonella. DR. HENRY: Of course. This is Craig Henry. But we have to bear in mind that we're not dealing with only Salmonella here as we step through. MR. SCHAD: I think, Craig, you hit on a

saying. The only thing I would add to that is that 1 2. I'd like to see FSIS sample product at the retail 3 level. 4 MS. TUCKER FOREMAN: Yes. 5 DR. DICKSON: More sampling at the retail 6 level because that's what the consumers eat, and 7 perhaps there is a way of looking at that retail 8 product back to the processing plant further back 9 through the system, but the missing piece in a lot of 10 this is sampling at retail, what the consumers 11 actually get in the package. 12 MS. TUCKER FOREMAN: This is Carol. If you 13 have a sample at the end of the processing line and a 14 sample at retail, you really have something that is 15 important to protecting public health. I agree with 16 you there. 17 DR. VETTER: Dana Vetter, NAFV. And I may 18 be reaching too far here, but I know FSIS has a 19 liaison within CDC, who is an FSIS employee. 20 that liaison not be used to help gather attribution 21 data specific to FSIS products? 2.2 QUICK: I think that's largely why MR.

1	she's there now.
2	MS. TUCKER FOREMAN: Yeah.
3	MR. QUICK: This is Bryce.
4	MS. TUCKER FOREMAN: Their financial
5	capacity to do this work is much smaller than FSIS.
6	MR. QUICK: Barring, you know, the heavens
7	opening up and, you know, us having money dumped on
8	us, it would be difficult to do the retail sampling
9	that was suggested. I'm not opposed to that. I mean
10	it's a good recommendation but I think we've got to
11	figure out a way to do that within at least our
12	current budget situation here.
13	MR. SCHAD: Doesn't some local health
14	agencies do that sampling?
15	MR. QUICK: Some do and some don't.
16	MR. SCHAD: Tony.
17	MR. CORBO: Tony Corbo, Food and Water
18	Watch. Has anybody tried to quantify the amount of
19	money that would be needed to actually have an
20	attribution data system that would actually deliver
21	the
22	MR. QUICK: We've had substantial

conversations. The attribution meeting a couple of months go was a really good start. I think we had all of the relevant agencies at the table. I think the estimates ranged from \$10 million to \$150 million depending on where you're focusing but it does require a substantial sum of not just resources, dollars but like you said, the local input. That's where the attribution of data would be collected. You've got to have that cooperative partnership.

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MR. CORBO: The Agency has been asked by the Hill repeated, Chris Waldrop brought it up in his presentation, and, you know, you see the mouth moving but I don't know what's coming out, and the thing is that if -- you know, the question may be asked of the wrong agency in terms of trying to deal with it.

MR. QUICK: And I think where you're going, CDC is the most relevant player, that I that's where we've got to get that answer, but I think we could do it with a limited amount of money for the product that we regulate now, and we would do it at retail, we would do sampling, attribution sampling there but we would have to do as Carol suggested, some type of

a baseline.

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MS. TUCKER FOREMAN: FSIS, it was certainly not -- Carol again. It's not a random sample, but FSIS from the time it started testing for *E. coli* did -- samples at retail from '96 or '95 until 2004, 5. And it learned something. In the process you have a lot of recalls. So that created the regulatory kickback. Why not grab it before it has to be recalled? But you need to have -- for research purposes, you need to know, is your regulatory system good enough to have it go out the door at this level and is it being undone somehow between the door of the processing plant and the retail store.

MR. SCHAD: Because it's like distribution for one thing.

MS. TUCKER FOREMAN: And if your purpose is to protect public health and not, you know, and have the data that you need to protect public health, you've just got to have that information.

MR. QUICK: And if I could say this, Bryce again, this is a debate that we are having internally at FSIS. I think this is a very healthy

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conversation. How would we do it and what type of resources should we direct at retail particularly with respect to attribution.

DR. HENRY: Did you get to speak, Tony?

MR. CORBO: I just did.

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DR. HENRY: I thought you were rolling back.

MR. CORBO: No, no.

DR. HENRY: Certainly, you know, again we're in a little bit of a mixed bag depending on how you look at it. Certainly the retail level, you know, NFPA in conjunction with other teams but, you know, we ran the first widespread *Lm* retail data test and then Tennessee and the rest of the National Food Safety Group just ran the second one, retail product, different issue.

I would caution, at the retail level relative to raw, let me just play out a little scenario for you. It's interesting to see what's happening, however, let's look at it -- I'm going to go tell my mom who's 90 what to go buy. Now if we start gathering this data the question is does it become public and what do we convey to the consumer

on a raw product because raw is going to have some level of pathogens one way or the other. Now the question is, what level should I buy and I don't care who is running any process, especially in the raw level, the variation is inherent, day-to-day. None of us in this room, individually can cut or peel an apple the same way two times in a row. Some are a little wider, some a little shorter, got a little more meat, a little less meat, you have a challenge.

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So think about, okay, if we find out what the numbers are, and I'm just saying, yeah, it would be interesting if we keep it in house, but for the consumer's perspective, well, mom, you know, I just looked at the latest data on the FSIS website, and Tyson for product 214 had the lowest level of Salmonella but Campylobacter numbers were up. Now you ought to buy that because the rest of them are higher.

Next week she goes to the store, and I'm going to turn around and say, oh, can't buy Tyson from 214. You've got to go to Pilgrim's Pride because they got the lower numbers. And so item for

item. It gets to be completely unmanageable, and I still think that even as we go through this, we're still needing to go back, if I could say, mom, we're seeing a real increase in Salmonella Heidelberg and it is coming through to the consumer and it's a major issue, and it's coming through from a particular part of the country that we can't control, if you buy this, make sure you cook it right.

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MS. TUCKER FOREMAN: Let me comment on, Craig -- it's Carol. Because again I'm trying to separate out a regulatory action right now and I know it's hard for you to do that because you're the subject of the regulation. I'm trying to get some research information, some data that would not be, I'm assuming that all of this would be aggregated data, and FSIS has aggregated data for years so we can have some notion of what's there and so that we've got a base to work from. The baseline data can't trace back to individual plants. And you're not talking about tracing any of this back to an individual plant or individual store.

But if you don't have some notion of what's

coming out, I keep going back to this, we don't know what works or what to do. And I'm going to say it now because I really -- I'm not comfortable relying on the Salmonella verification samples for very much because or anything, because -- it looked like a terrific step forward when they started 10 years ago, and nothing's been updated since then, and there's been a lot of problems with the administration of it, the taking of the samples, and I just don't know that it means anything.

MR. SCHAD: Dana.

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I was just going to comment DR. VETTER: that I think that retail data would be useful but I think you need to keep in mind that there are also variables on that end between the time that it left the plant and the time and the time that it's sitting out there in the cooler in the store. How is it stored in the retail establishment? is How it And what I'm getting at is that not transported? that sampling in retail establishment would not be good, but that if you could even expand upon that and pair it with end of the line products before it left

1 that establishment and then those same products, 2 maybe even from that same establishment, store, that that might give you an 3 retail 4 broader picture of what the consumers are purchasing 5 and where those problems might be occurring. 6 it is, you know, effective in between. 7 MS. TUCKER FOREMAN: One of the things I'd 8 like to have there is if it leaves the Tyson plant on 9 day, I'd like to have that day's production 10 picked up anonymously at a supermarket three days 11 later, four days later, and FSIS doesn't regulate 12 anything after it leaves the Tyson plant. But if you 13 want to talk about protecting public health, we have 14 to know, is the problem at the Tyson plant or is the 15 problem after that? What happens after that? 16 used to be I think perhaps more than it is right now 17 because we know there was a lot of unrefrigerated 18 chicken at one point. 19 DR. HENRY: Mark, if I may. 20 MR. SCHAD: Yes. 21 DR. HENRY: And I'm with you. I think we 2.2 can actually do better than that, Carol.

1 MS. TUCKER FOREMAN: Okay. Whatever we found at retail 2. DR. HENRY: still at this particular time actually comes back and 3 4 says, well, FSIS allowed it to happen and again we're 5 back to risk assessment to say what happened. 6 happened? You know, which serotype, whatever. 7 I still think if we're going to make a 8 difference in actuality, we have to get back down to 9 the plant. I don't think that it can be shotgunned 10 with aggregate data because we haven't dealt with an 11 intervention yet at the raw level. We're just saying 12 this process passes through the performance standards 13 which I concur with you, up to now, hey, it was all 14 done for the best intention. I think you were on 15 board at that point in time, at least my plants were. 16 You were in FSIS at that point. 17 MS. TUCKER FOREMAN: No, but I was for it. 18 **HENRY:** But I mean we went DR. Okay. 19 through with that process and we've done the best we

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whatever is the appropriate attributable cause, and

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Net/net after this many years, we still are not

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consistently

the issue back to the state is really the paramount, trying to get help at CDC with your guys. That's not is. Ιf anybody came where the issue to the attribution meeting and heard, and I've got a saying, the veterinarian from Tennessee, actually it was an M.D., if you heard him speak, the problem is getting the data from the guy or lady who's sick that walks hospital that into the can't capture we the epidemiological questionnaire information from.

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MS. TUCKER FOREMAN: Yeah.

DR. HENRY: But again, you know, whether you get 1 out of 5, 1 out of 10, 1 out of 100, right now if we could capture even 1 more or 2 more, we'd get a better idea of really where the problem is and whether it's attributable to a given particular product type and/or ultimately to a particular plant.

Now getting back, Carol, I think that's where we really want to look for, okay, what is the process, what is the intervention that's going to change the load going out? You know, a dozen NRs, you know, that's a process failure in the general sense relative to the statute, not relative to the

intervention. If we have a CCP, if we know there's an intervention, let's take one, let's take a simple one.

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Suppose we went through and had irradiation. Suppose, not saying we're going to do that, we don't -- but if we had irradiation there, and we know there was certain level of pasteurization or sterilization, and the product's coming out positive, boom. We've got a smoking gun. We don't even have to go to retail. We've got that at plant level. That's where the focus needs to be but we've got to make sure we've got our eye on the bouncing ball especially with Salmonella because I repeat again, Mother Nature will change that process for us whether we like it or not, the serotype changes.

MS. TUCKER FOREMAN: I just want the basic data first. I can't -- I find it hard to justify taking this step until I know what the number is that you're starting with and then you can go apply the interventions and see what lowers --

DR. HENRY: But bear in mind now, just to

be fair, between the point -- the end of the intervention and downstream, no one's got control of that, and I can tell you, I mean I've wanted, I have followed trucks to plants. I've followed the delivery of the product.

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MS. TUCKER FOREMAN: The intervention gets you out the doors of the packing plant. The intervention may or may not influence what's in the retail store. If you intervened up line, you know, if you have the carcass, steam vacuum, the rinse and all the other things in the slaughter house, then you've got a low load on the ground beef that goes out, as long as it wasn't mixed in with some trim that wasn't tested, and the chances are, I think, that you're going to have a product with less of a load at the retail store. I'd sure as hell like to know if I'm wrong.

DR. HENRY: Craig Henry again. Now and concur, again let's, we're going to have to get back down to dollars. Again it's a matter of time as to how much, yeah, it would be great, we can go do that, and I certainly advocate that on an aggregate basis

1	that we don't, you know, get the public all shaken
2	apart, you know, depending on how the data's managed.
3	But ideally we could go out and do that, if FSIS has
4	the money and the budget, go out and do some raw
5	evaluations, they're certainly going to be helpful.
6	Again, it's establishing a baseline at the retail
7	level, which has to stand independent of everything
8	else. Whether we can reflect back, correlate back or
9	anything else to the plant remains to be seen.
10	I still think for this Committee, for what
11	we're trying to do, the Subcommittee, answering
12	question 2, we need to be very focused on funding at
13	the appropriate places, serotype identification,
14	attribution data and then the tracking and
15	enumeration that starts from the plant moving forward
16	and get away from the shotgun approach.
17	MS. TUCKER FOREMAN: What's the shotgun
18	approach?
19	DR. HENRY: What we're currently doing.
20	MR. SCHAD: Jim.
21	DR. DICKSON: I'd like to comment on this.
22	I would still, and I realize there's lots of

1	technical barriers here, financing and everything
2	else, but the consumer buys at retail. They don't
3	buy coming out of the chiller or the chill tank.
4	They buy retail. There's a lot of variability that
5	happens but the product that the consumer is buying,
6	the consumer is seeing the USDA inspection label on
7	it, and they're buying it at their local supermarket,
8	we need to know what they're buying.
9	DR. HENRY: They need to know?
10	DR. DICKSON: They need to know.
11	DR. HENRY: I think we concur on that.
12	MS. TUCKER FOREMAN: You don't have any
13	disagreement.
13 14	DR. HENRY: No, you don't have any
14	DR. HENRY: No, you don't have any
14 15	DR. HENRY: No, you don't have any disagreement but again it's for scientific purposes.
14 15 16	DR. HENRY: No, you don't have any disagreement but again it's for scientific purposes. DR. DICKSON: Right, right.
14 15 16 17	DR. HENRY: No, you don't have any disagreement but again it's for scientific purposes. DR. DICKSON: Right, right. DR. HENRY: It's not for consumers to make
14 15 16 17 18	DR. HENRY: No, you don't have any disagreement but again it's for scientific purposes. DR. DICKSON: Right, right. DR. HENRY: It's not for consumers to make decisions.
14 15 16 17 18	DR. HENRY: No, you don't have any disagreement but again it's for scientific purposes. DR. DICKSON: Right, right. DR. HENRY: It's not for consumers to make decisions. MS. TUCKER FOREMAN: It's not for

	DR. DICKSON: But the message to consumers
2	is still the same because right now we tell them to
3	cook it because we don't have any idea what's on
ŀ	there. So the message to consumers doesn't change.
·	But we need to know what the consumer's buying.
	MS. TUCKER FOREMAN: I would not change the
,	message to cook it well done ever.
3	DR. HENRY: This is Craig Henry. If I had
)	my choice, those buying risky products should be
)	licensed to do so.
	(Laughter.)
)	DR. VETTER: This may not have any
3	substance, but on that note, how many people here use
Ŀ	a thermometer when they cook their meat?
	DR. MURINDA: The last component of that
	second question with regards to food related illness,
,	I think we're basically talking about the approaches
3	that we are going to be using to get the information
)	on the microbiologics. So how do we get information
)	on food related human illness? We are mostly dealing
	with food products here.
)	DR. HENRY: This is Craig Henry. The

funding has to be there to get the attribution data enhanced from a state and federal CDC level, to make sure we understand what is causing the foodborne illness so that we know what the correct pathogen is which then would relate backwards to the plant.

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MS. TUCKER FOREMAN: Let me follow up on what Craig just said. I think that's a good point, and I think it would be helpful if maybe overnight we could get a couple of the lines from the food attribution meeting where there were some comments toward the end of the meeting about the lack of resources across the boards, CDC, FDA, FSIS. alone can't do this, and I think it would be good if our report said, if you want to advance, if you want to reduce foodborne illness, you're going to have to have increased resources for the CDC to do food attribution research, to get that instrument, that means they have to be able to go out to the states in those cases, and for the FDA and for FSIS, anyone of them working separately is not going to come up with something, while it may be useful, but won't be as helpful as it would be if we had a

coordinated effort. And they do seem all sold now on the need to do it.

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DR. MURINDA: It does appear like CDC has quite a massive data save on their PulseNet program, that some of that information is directly correlated to human illness.

MS. TUCKER FOREMAN: And they have two people trying to get it out of PulseNet and into useable form is one of the things we learned at that meeting a few months back. And if the second person has to go off and work on SARS or something else, everything stops. They're sitting on what probably a lot of really good information, enough, because they don't ask for food specific They ask for pathogens. information. So this is the basic problem. They ask only for pathogen specific Nothing in their inquiry says and what information. food did you eat that you might have gotten it from, and they have to change their database to do that.

DR. HENRY: This is Craig Henry. Just to qualify, because of the recent recall we're going through, I know that there's in depth information

1	that was brought through with the Castleberry recall.
2	They are asking very specific food information in
3	that guise, and that's still CDC involved anyway.
4	But I totally concur that the funding and the effort
5	has to be joint with equal responsibility for
6	delivery. It can't be, oh, I'll get to my part but
7	I'm going to change it two or three years later. If
8	we're going to go fix the problem, everyone has got
9	their head on the same chopping block, and everybody
10	better be able to deliver and when we go do this, we
11	need lots of fingerprints.
12	MR. SCHAD: Name off those entities for me
13	again.
14	DR. HENRY: Well, in this case, all the
15	federal agencies and the appropriate state agencies
16	need to be engaged. So that's USDA, certainly CDC,
17	and the State Departments of Agriculture or Health.
18	UNIDENTIFIED SPEAKER: FDA.
19	DR. HENRY: Pardon me.
20	UNIDENTIFIED SPEAKER: FDA.
21	DR. HENRY: Well, and FDA where they fit

1	those that are at the retail level. Certainly,
2	they're the big players. And ultimately we also have
3	APHIS and CBM involved in this relative to the
4	regulatory barriers that we're still incurring for
5	the intervention because we're not getting anything
6	done unless we have recognized interventions to
7	change the numbers. Because we'll chase these
8	numbers, we'll all be dead and gone and we'll still
9	be chasing the same numbers because they're going to
10	go up and down because Mother Nature changes it and
11	the process is variable.
12	MS. TUCKER FOREMAN: I'm okay and in fact
12 13	MS. TUCKER FOREMAN: I'm okay and in fact would favor that if we could just have the research
13	would favor that if we could just have the research
13 14	would favor that if we could just have the research and the interventions mentioned separately because I
13 14 15	would favor that if we could just have the research and the interventions mentioned separately because I don't want to bring in APHIS and CBM into the data
13 14 15 16	would favor that if we could just have the research and the interventions mentioned separately because I don't want to bring in APHIS and CBM into the data gathering. So we just need to
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13 14 15 16 17 18	would favor that if we could just have the research and the interventions mentioned separately because I don't want to bring in APHIS and CBM into the data gathering. So we just need to DR. HENRY: APHIS and CBM as is relevant to the intervention. MS. TUCKER FOREMAN: Right. Yeah, okay.

1	MR. SCHAD: Yeah, you've got to help me out
2	on that, on the research part of it, Carol. You seem
3	to want to keep the research.
4	MS. TUCKER FOREMAN: Well, the data
5	collection versus the intervention is the way CDC,
6	FDA and FSIS are the data collecting agencies here.
7	APHIS and CBM are and sometimes FSIS, are the ones
8	that get in the way of using new interventions.
9	MR. SCHAD: Okay. Right.
10	DR. HENRY: Are we all straight on that?
11	DR. VETTER: I would just add, the recent
12	chili recall, that is where all of the agencies have
13	worked together to go out and do recall effectiveness
14	checks. They started with a blitz, where we just
15	randomly went out and looked, and then we went into
16	specific establishments on consignee lists but we not
17	only when we went out were looking at USDA products,
18	but also FDA products. So that might be used
19	UNIDENTIFIED SPEAKER:
20	DR. VETTER: Exactly, to build upon the
21	cooperation that has occurred between CDC, FDA and
22	FSIS in that particular situation, to build upon that

1	in collecting this data.
2	MS. TUCKER FOREMAN: This is Carol. I
3	thought I heard at the food attribution meeting real
4	appeals from CDC and the help they need to look for
5	more data and be able to download the data, get it
6	out, that they have. You all can continue
7	DR. MACZKA: I
8	MS. TUCKER FOREMAN: I hope so because MOUs
9	are generally as good as Confederate money, but I
10	think, you all have such good intentions that this
11	one's finally got somewhere today.
12	DR. MACZKA: We have a database manager
12 13	DR. MACZKA: We have a database manager down there and an analyst down there at CDC. So that
13	down there and an analyst down there at CDC. So that
13 14	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the
13 14 15	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the right direction.
13 14 15 16	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the right direction. MS. TUCKER FOREMAN: Do we need to mention
13 14 15 16 17	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the right direction. MS. TUCKER FOREMAN: Do we need to mention some of those things in our Subcommittee report, that
13 14 15 16 17	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the right direction. MS. TUCKER FOREMAN: Do we need to mention some of those things in our Subcommittee report, that these or just generally say that there are some
13 14 15 16 17 18 19	down there and an analyst down there at CDC. So that plan is underway, and so I think we're working in the right direction. MS. TUCKER FOREMAN: Do we need to mention some of those things in our Subcommittee report, that these or just generally say that there are some detailed steps going on interagency right now that

1	MS. TUCKER FOREMAN: Good examples.
2	MR. SCHAD: Because some people say, you
3	know, tomorrow morning, they'll say
4	MS. TUCKER FOREMAN: What are you talking
5	about? Yes. It sounds good.
6	MR. SCHAD: Can you help me out with that
7	statement, Carol.
8	MS. TUCKER FOREMAN: My brain turns off at
9	5:00.
10	(Laughter.)
11	DR. HENRY: You've got a couple of minutes.
12	MR. SCHAD: FSIS is currently doing
13	internally some
14	MS. TUCKER FOREMAN: They'll help us back
15	here. There are coordinating projects underway with
16	the CDC and FDA.
17	DR. MACZKA: And ARS.
18	MS. TUCKER FOREMAN: And ARS. Of course, I
19	always like to throw in the line that says FSIS needs
20	some research money of its own to apply to the
21	specific regulatory needs that it has. FSIS doesn't
22	get any money to do research. It has to rely on ARS

1	and that's another barrier getting these things done.
2	MR. SCHAD: What I was thinking right now,
3	what we've got so far, we'll print that out and take
4	a look at it right now, would we be able to do that,
5	since we've been talking here almost two hours and
6	MS. TUCKER FOREMAN: Sure.
7	DR. HENRY: Yes.
8	MR. SCHAD: We've got to see what we've got
9	done.
10	DR. HENRY: See how close we are because
11	we're not going to have much time tomorrow.
12	MS. TUCKER FOREMAN: Read it now and polish
13	it up in the morning.
14	(Whereupon, at 4:51 p.m., the meeting was
15	concluded.)
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1	CERTIFICATE
2	This is to certify that the attached proceedings
3	in the matter of:
4	NATIONAL ADVISORY COMMITTEE ON
5	MEAT AND POULTRY INSPECTION
6	SUBCOMMITTEE 1
7	LINKING FSIS ACTIVITIES TO ITS
8	PUBLIC HEALTH GOALS
9	Arlington, Virginia
10	August 8, 2007
11	were held as herein appears, and that this is the
12	original transcription thereof for the files of the
13	United States Department of Agriculture, Food Safety
14	and Inspection Service.
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16	
17	VICTOR LINDSAY, Reporter
18	FREE STATE REPORTING, INC.
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